

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

United States of America

Case: 4:18-CR-20368

Hon. Linda V. Parker

v.

MJ: Hon. Stephanie Dawkins Davis

D-2 Scott Phillip Zack,

Defendant.

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**GOVERNMENT'S RESPONSE IN OPPOSITION TO  
DEFENDANT'S MOTION TO ALLOW TRAVEL**

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The United States of America hereby files this response in opposition to Defendant Scott Zack's Motion to Allow Travel, and in support thereof states:

1. On or about February 24, 2017, Defendant Scott Zack received a letter informing him he was the target of a federal grand jury investigation.
2. On or about July 3, 2017, Defendant Scott Zack appears to have booked a Royal Caribbean International cruise for four persons, including himself and several family members, for a total of approximately \$17,718. (Doc # 36-3 at 2). Documents provided by Defense Counsel indicate Defendant Scott Zack could have cancelled this cruise at any time prior to May 22, 2018, and would only have incurred a cancellation fee of \$250 per person.

3. On or about May 24, 2018, Defendant Scott Zack was charged in an Information with one count of Structuring a Financial Transaction, in violation of 31 U.S.C. § 5234.
4. On or about May 29, 2018, Magistrate Judge Stephanie Dawkins Davis signed an Order setting conditions of release for Defendant Scott Zack with terms that provided, among other things, that he must surrender his passport and restrict his travel to the state of Michigan and the state of Florida. (Doc # 36-2 at 2).
5. On July 18, 2018, Defendant Scott Zack entered a plea of guilty to the Information in this matter, charging him with a violation of 31 U.S.C. § 5234.
6. Defendant Scott Zack made arrangements to travel outside the continental United States after he became aware he was the target of a federal grand jury investigation. He failed to cancel those travel reservations after executing a plea agreement in this matter. The Government asks this Court to deny Defendant's request for travel outside of the continental United States because the Government would need to expend significant resources to locate and secure the custody of Defendant Scott Zack, should he decide to remain outside of the continental United States in violation of his bond conditions.

WHEREFORE, the government requests this Court deny Defendant Scott Zack's Motion to Travel.

Respectfully submitted,

MATTHEW SCHNEIDER  
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s/Mark McDonald  
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Dated: July 30, 2018

### **CERTIFICATE OF SERVICE**

I hereby certify that on the 30th day of July, 2018, I caused the foregoing document to be electronically filed with the Clerk of the Court and copies of same were forwarded to all interested parties through the ECF system.

/s/ Mark McDonald  
Mark McDonald  
(VA 72198)